



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

March 7, 2002

Nancy Fletcher, Treasurer
Outdoor Advertising Association of
America Political Action Committee
1850 M Street, NW, Suite 1040
Washington, DC 20036

Identification Number: C00045781

Reference: Mid-Year Report (1/1/01-6/30/01)

Dear Ms. Fletcher:

This letter is to inform you that as of March 6, 2002 the Commission has not received your response to our request for additional information, dated February 13, 2002. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by March 27, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you have any questions regarding this matter, please contact Jim Krebs on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division), our local number is (202) 694-1130.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

FEB 13 2002

Nancy Fletcher, Treasurer
Outdoor Advertising Association of
America Political Action Committee
1850 M Street, NW, Suite 1040
Washington, DC 20036

Identification Number: C00045781

Reference: Mid-Year Report (1/1/01-6/30/01)

Dear Ms. Fletcher:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the

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contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

-Please identify the name and address of the payee for the in-kind contribution(s) disclosed on Schedule B for Line 23.

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2001 Pennsylvania Special General election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

OUTDOOR ADVERTISING ASSOCIATION OF AMERICA POLITICAL ACTION
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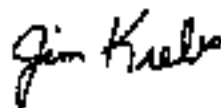
If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Jim Krebs
Reports Analyst
Reports Analysis Division

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 27 / 30

☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25
☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)

Outdoor Advertising Association of America Political Action Committee

Full Name (Last, First, Middle Initial)

A. BILL SHUSTER FOR CONGRESS

Mailing Address

207 ALLEGHENY STREET

City

HOLLIDAYSBURG

State

PA

Zip Code

16648

Purpose of Disbursement

Candidate Name

Category
Type

Date of Disbursement

06 / 20 / 2001

Amount of Each Disbursement this Period

500.00

PA Special General was held
on 5/15/01.

Transaction ID: SB23.5023

Full Name (Last, First, Middle Initial)

B. BORSKI FOR CONGRESS COMMITTEE

Mailing Address

PO BOX 26848

City

PHILADELPHIA

State

PA

Zip Code

19184

Purpose of Disbursement

In-Kind Food & Beverage

Candidate Name

Category
Type

Date of Disbursement

06 / 29 / 2001

Amount of Each Disbursement this Period

741.40

Transaction ID: SB23.5028

Full Name (Last, First, Middle Initial)

C. CITIZENS FOR TOM PETRI

Mailing Address

PO BOX 270

City

FOND DU LAC

State

WI

Zip Code

54935

Purpose of Disbursement

Candidate Name

Category
Type

Date of Disbursement

03 / 01 / 2001

Amount of Each Disbursement this Period

5000.00

Transaction ID: SB23.5001

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

6241.40

